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HALPRIN, TEMPLE & GOODMAN

Mr. William Caton
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experiences in Canada, believes that such coordination can be achieved.

Finally, Northern Telecom expressed concern that the Rules proposed by Alcatel establish different minimum "fill" percentages for initial usage for wide band and narrow band systems. The Alcatel proposal would establish a 25% factor for narrow band systems, while imposing a 90% or 75% factor for wide band systems. Northern Telecom believes that the initial factors should be the same, while recognizing that additional percentage of capacity milestones could be imposed as the system is used over time.

Northern Telecom fully supports the Commission's efforts to establish Personal Communications Services ("PCS"), and recognizes that the accommodation of relocated 2 GHz users is a necessary part of PCS deployment. While it is important that the Commission move ahead expeditiously with PCS, it is also important that the Commission do so in a manner that does not jeopardize the tremendous benefits of wide band systems.

Sincerely,



Stephen L. Goodman
Counsel for Northern Telecom Inc.

cc: Brian Fontes